

**SCHENCK PRICE SMITH & KING LLP**

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Cyprus Amax Minerals Company f/k/a  
Cyprus Mines Corporation*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

<b>IN RE: JOHNSON &amp; JOHNSON TALCUM POWDER PRODUCTS MARKETING, SALES PRACTICES AND PRODUCTS LIABILITY LITIGATION</b>	<b>MDL No. 2738</b>  <b>Civ. Action No. 3:16-md-02738(FLW)(LHG)</b>  <b>NOTICE OF SUGGESTION OF BANKRUPTCY</b>  <i>Document Filed Electronically</i>
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PLEASE TAKE NOTICE THAT, on February 11, 2021, Cyprus Mines Corporation (the “Debtor”) filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. § 101 *et seq.* (the “Bankruptcy Code”), in the United States Bankruptcy Court for the District of Delaware. The Debtor’s chapter 11 case is being administered under the following caption: *In re Cyprus Mines Corporation*, Case No. 21-10398 (Bankr. D. Del.).

PLEASE TAKE FURTHER NOTICE THAT, pursuant to section 362 of the Bankruptcy Code, the filing of the petition stays, among other things, the initiation or continuation of judicial, administrative, or other actions or proceedings against the Debtor or any act to obtain possession of or exercise control over property of the Debtor.

PLEASE TAKE FURTHER NOTICE THAT, pursuant to applicable law, including *Emoral, Inc. v. Diacetyl (In re Emoral)*, 740 F.3d 875 (3d Cir. 2014), *cert. denied sub nom.*,

*Diacetyl Plaintiffs v. Aaroma Holdings, LLC*, 574 U.S. 974 (2014), all claims and causes of action against the Debtor’s parent company, Cyprus Amax Minerals Company, based on principles of successor liability, veil-piercing, alter ego or other theories that are “general” to claimants against the Debtor (740 F.3d at 880), are property of the Debtor’s bankruptcy estate and subject to the automatic stay.

Dated: February 11, 2021

Respectfully submitted,

SCHENCK PRICE SMITH & KING LLP

*/s/ Mark K. Silver*

Mark K. Silver, Esq.